The Progressive Corporation Policy Statement on Political Contributions, Trade Groups and Lobbying

Applicability

This Policy Statement on Political Contributions, Trade Groups and Lobbying (the "Policy") governs corporate political contributions, other campaign expenditures, payments to trade groups and lobbying expenditures by The Progressive Corporation (the "Company") and its affiliated and subsidiary companies (collectively, "Progressive").

Political Activities of Employees

While Progressive employees may participate as individual citizens in the political process, decisions to do so are entirely personal and voluntary. Employees engaging in political campaign activities are expected to do so as private citizens, and must at all times make clear that their views and actions are their own, and not those of Progressive. Employees must not use their title or position with Progressive to solicit, coerce or pressure others, including other employees, to make contributions to any political candidate, party, advocacy group or political entity, or to support or oppose any political candidate or election. For example, Progressive employees should not use Progressive letterhead, e-mail or any other item that references their title or position for any personal political activities.

Corporate Political Contributions, Trade Groups and Lobbying

Philosophy

Public policy issues have the potential to impact Progressive's business, its employees, business partners, shareholders, and the communities in which Progressive operates. Most obviously, the Company's affiliated and subsidiary insurance companies are regulated by every state in which they are licensed or transact business. Within a state, the judicial climate and the policies and laws enacted by the government have a significant effect on Progressive's ability to write insurance profitably. The Company's Board of Directors (the "Board") believes that in certain cases it is appropriate and in the shareholders' best interests to use Progressive's resources to (1) contribute or pay membership fees to trade and industry associations that are engaged in political activity, especially national and state insurance industry trade associations, (2) make political contributions to political parties, candidates for public office, ballot measures, political committees or political organizations (including entities organized under Section 527 of the Internal Revenue Code and entities (other than trade and industry associations) organized under Section 501(c)(4)) on the federal, state or local level and (3) incur lobbying expenses related to legislation or ballot initiatives or referenda that impact Progressive's business.

The Board has adopted this Policy to ensure that political contributions and expenditures, payments to trade and industry associations, and lobbying expenses are made in a manner consistent with Progressive's Core Values and to protect or enhance shareholder value, without regard to the private political preferences of Progressive officers. The use of any Progressive funds, regardless of the source, for political contributions or expenditures, payments to trade and industry associations, and lobbying expenses, must follow this Policy, including any applicable provisions for approvals.

Federal Elections and Independent Expenditures and Electioneering Communications

As a general rule, Progressive funds should not be used for contributions related to a U.S. federal election (whether to a candidate, political party, or political action committee) because it may be against the law. In some cases, however, Progressive funds may be used to support some federal political activity, but such contributions and expenditures must be approved in advance as described in the next paragraph.

In 2012, the United States Supreme Court ruled in Citizens United v. Federal Election Commission that U.S. corporations may not be prohibited generally from using their funds to pay for certain independently made partisan political advertisements and other political communications referred to as "independent expenditures" and "electioneering communications." Notwithstanding the Supreme Court's decision, the Company has determined that Progressive generally will not make direct independent expenditures or pay for any electioneering communication in federal campaigns, as those terms are defined by applicable law, and specifically, that no such expenditures or payments will be made without the express approval of the Chief Executive Officer.

Guidelines; Approval Requirement

Any political contribution, independent expenditure, payment to a 527 organization, or payment to a 501(c)(4) organization for the purpose of supporting or opposing a candidate or ballot measure that is made by Progressive, regardless of the source of the funds, must support a political candidate, political party, or ballot initiative that is in the long-term business interests of Progressive. Membership fees or contributions to a trade or industry association and lobbying expenses must support objectives that are beneficial to the long-term business interests of Progressive. All political contributions must also comply with this Policy, the Foreign Corrupt Practices Act, and all other applicable laws and regulations in the jurisdictions in which the contributions are made.

All political contributions must be approved in advance by the Personal Lines President and Law Department.

Board Oversight

Management will report annually to the Board's Nominating and Governance Committee (the "Committee") regarding compliance with this Policy and will provide a review of the overall strategic priorities for political contributions and trade group affiliations.

Disclosures

This Policy will be published on Progressive's website. Progressive shall at all times comply with all applicable laws and regulations relating to the reporting requirements of corporate political contributions.

Twice a year, the Company shall publish on its website information, with respect to the most recent half of the year, regarding: any political contributions, independent expenditures, payments to Section 527 organizations, payments to Section 501(c)(4) organizations (other than trade and industry associations) for the purpose of supporting or opposing candidates or ballot measures, and payments to any trade or industry association that exceed $50,000 in the aggregate on an annual basis. Reports will be published every six months covering the immediately preceding half of the year (e.g, a report covering the period July 1, 2023 through December 31, 2023 will be published by June 30, 2024). The published information will include the date, amount and recipient of such payments, and, with respect to payments to any trade or industry association, a percentage of such dues that may be used for political expenditures.

Prior to disclosure of the report and information on the website, the report or information, as the case may be, will be presented to the Committee for review.

Amendments to the Policy

Amendments to this Policy must be approved by the Board.

Last Amended: December 1, 2023